



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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OFFICE OF THE
REGIONAL ADMINISTRATOR

August 11, 2015

Brian Mills
Office of Electricity Delivery and Energy Reliability, OE-20
U.S. Department of Energy
1000 Independence Avenue SW
Washington, DC 20585

RE: EPA Region 1 comments on NEPA Draft Environmental Impact Statement for the New England Clean Power Link Transmission Line Project (NECPL)

Dear Mr. Mills:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, we submit the following comments on the Draft Environmental Impact Statement (DEIS) for the Department of Energy's (DOE) NEPA process regarding the New England Clean Power Link Transmission Line Project ("project") proposed by TDI-New England (TDI-NE) in Vermont.

Our comments are based on information provided in DOE's May 2015 Draft Environmental Impact Statement as well as its August 26, 2014 Notice of Intent (NOI) document for the project and information contained in the May 20, 2014 TDI-NE application for a Presidential Permit for the Clean Power Link (high Voltage Direct Current) HVDC Transmission Project. According to this information, the objective of the project is to deliver renewable power from Quebec, Canada into Vermont (and ISO-NE) through a new 154-mile 1000 MW high-voltage electric power transmission system. The proposed transmission system will have two cables that will run from Quebec to an HVDC converter station in Ludlow, VT. Approximately 98-miles (or 60 percent) of the alignment will be installed in Lake Champlain (beneath, or in deeper segments on top of the lake bed) with the balance of the alignment over land generally following existing roadway right-of-way alignments. The applicant proposes to have the project in service by 2019.

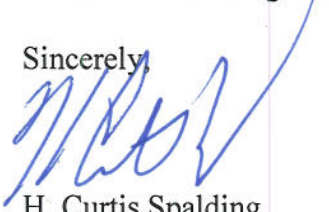
The construction and operation of the project could result in range of direct, indirect and cumulative impacts to resources that are within EPA's jurisdiction and expertise. Based on our review of the project information available, we believe the DEIS has covered many of the environmental concerns. We look forward to reviewing the Final Environmental Impact Statement. Our comments focus on impacts during construction, operation and maintenance of the project to wetlands, water quality, drinking water, environmental justice and air quality. Our detailed comments on these issues and project alternatives are attached.

EPA acknowledges the potential air quality benefits for New England associated with increased use of imported renewable energy and the role the project could play in providing additional capacity to deliver that energy. We encourage the DOE to develop an FEIS for the project that addresses the environmental issues articulated in this letter.

In accordance with EPA's national rating system, a description of which is attached to this letter, we have rated the DEIS EC-2-Environmental Concerns-Insufficient Information. As noted in our detailed comments, additional information is needed on the full extent of the impacts of the alternatives. Hopefully, our recommendations regarding additional information will be helpful to you in moving the NEPA process forward.

Thank you for the opportunity to provide these comments on the New England Clean Power Link Transmission Line Project DEIS. We believe the issues we have identified can be fully addressed in the FEIS and we are willing to work with your agency to develop a strategy to achieve that goal. Should you have any questions or wish to discuss our concerns, please contact William Walsh-Rogalski, Acting Director, Office of Environmental Review at 617-918-1035.

Sincerely,



H. Curtis Spalding
Regional Administrator

Attachment
Submitted to Brian.Mills@hq.doe.gov